

1 Scott E. Gizer, Esq., Nevada Bar No. 12216  
2 *sgizer@earlysullivan.com*

2 Sophia S. Lau, Esq., Nevada Bar No. 13365  
3 *slau@earlysullivan.com*

3 EARLY SULLIVAN WRIGHT  
4 GIZER & McRAE LLP

4 8716 Spanish Ridge Avenue, Suite 105  
5 Las Vegas, Nevada 89148

5 Telephone: (702) 331-7593  
6 Facsimile: (702) 331-1652

7 Kevin S. Sinclair, NV Bar No. 12277  
8 *ksinclair@sinclairbraun.com*

9 SINCLAIR BRAUN LLP  
10 16501 Ventura Blvd, Suite 400  
11 Encino, California 91436  
12 Telephone: (213) 429-6100  
13 Facsimile: (213) 429-6101

14 Attorneys for Defendant  
15 LAWYERS TITLE OF NEVADA, INC.

16 DESIGNATED LOCAL COUNSEL FOR SERVICE OF  
17 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

18 Gary L. Compton, State Bar No. 1652  
19 2950 E. Flamingo Road, Suite L  
20 Las Vegas, Nevada 89121

11 UNITED STATES DISTRICT COURT

12 DISTRICT OF NEVADA

13 BANK OF AMERICA, N.A.,

14 Plaintiff,

15 vs.

16 FIDELITY NATIONAL TITLE GROUP,  
17 INC. et al.,

18 Defendants.

19 Case No.: 2:21-CV-00349-JCM-DJA

20 **STIPULATION AND ORDER TO  
21 EXTEND TIME TO RESPOND TO  
22 COMPLAINT, REMAND MOTION,  
23 AND FEES MTION (ECF NOS. 1, 6,  
24 AND 7)**

25 **FIRST REQUEST**

26 COMES NOW defendant Lawyers Title of Nevada, Inc. ("Lawyers Agency"), defendant  
27 Fidelity National Title Insurance Company ("FNTIC"), defendant Fidelity National Title Group,  
28 Inc. ("FNTG") and plaintiff Bank of America, N.A. ("Bank of America") (collectively, the  
"Parties"), by and through their respective attorneys of record, which hereby agree and stipulate  
as follows:

1       1. On March 1, 2021 Bank of America filed its complaint in the Eighth Judicial  
2 District Court for the State of Nevada;

3       2. On March 1, 2021, FNTIC removed the instant case to the United States District  
4 Court for the State of Nevada (ECF No. 1);

5       3. Lawyers Agency's response to Bank of America's complaint is currently due on  
6 April 12, 2021;

7       4. FNTIC's response to Bank of America's complaint is currently due on April 15,  
8 2021;

9       5. Bank of America filed a motion to remand and a motion for fees (ECF Nos. 6 and  
10 7);

11       6. Lawyers Agency's, FNTIC's, and FNTG's (collectively, "Defendants") deadline to  
12 respond to the motion to remand and the motion for fees is currently April 14, 2021;

13       7. The Parties are in the process of formalizing a stipulation to stay this case pending  
14 the appeal in *Wells Fargo Bank, N.A. v. Fidelity National Title Ins. Co.*, Ninth Cir. Case No. 19-  
15 17332 (District Court Case No. 3:19-cv-00241-MMD-WGC);

16       8. Defendants request a two-week extension of these deadlines to afford the Parties  
17 additional time to formalize their stipulation to stay this case;

18       9. Counsel for Bank of America does not oppose the requested extension;

19       10. This is the first request for an extension made by FNTIC and Lawyers Title, which  
20 is made in good faith and not for the purposes of delay.

21       11. This stipulation is entered into without waiving any of FNTIC's or Lawyers Title's  
22 objections under Fed. R. Civ. P. 12.

23       //

24       //

25       //

26       //

27       //

28       //

1           **IT IS SO STIPULATED** that Lawyers Title's deadline to respond to the complaint is  
2 hereby extended through and including Monday, April 26, 2021, Defendants' deadline to respond  
3 to the motion to remand and the motion for fees (ECF Nos. 6 and 7) for fees is hereby extended  
4 through and including Wednesday, April 28, 2021, and FNTIC's deadline to respond to the  
5 complaint is hereby extended through and including Thursday, April 29, 2021.

6           Dated: April 12, 2021

SINCLAIR BRAUN LLP

7  
8           By: /s/-Kevin S. Sinclair  
9           KEVIN S. SINCLAIR  
10           Attorneys for Defendants  
11           LAWYERS TITLE OF NEVADA, INC.

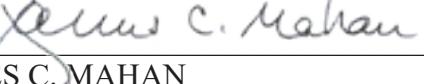
12           Dated: April 12, 2021

13           WRIGHT FINLAY & ZAK, LLP

14           By: /s/-Darren T. Brenner  
15           DARREN T. BRENNER  
16           Attorneys for Plaintiff  
17           BANK OF AMERICA, N.A.

18           **IT IS SO ORDERED.**

19           Dated April 14, 2021.

20             
21           JAMES C. MAHAN  
22           UNITED STATES DISTRICT JUDGE